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Attorneys for Federal Defendant
 LOUIS DEJOY, Postmaster General

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

KYUNG SOOK JONES,)	Civil Action No. 4:21-cv-02849-HSG
)	
Plaintiff,)	
)	
v.)	ADMINISTRATIVE MOTION TO
)	EXTEND CASE SCHEDULE
LOUIS DEJOY, Postmaster General United)	(DKT. NO. 36) AND
States Postal Service (Pacific Area Agency),)	ORDER
)	
Defendant.)	
)	
)	
)	

Pursuant to Civil Local Rule 6-3, Federal Defendant Louis DeJoy, U.S. Postmaster General, respectfully requests to extend the Case Schedule on Administrative Exhaustion by two (2) days. Plaintiff has not provided her position on the request for an extension.

WHEREAS, on October 28, 2021, the Court issued a Scheduling Order regarding the issue of Administrative Exhaustion. *See* ECF No. 31.

WHEREAS, on December 16, 2021, the Court amended the Scheduling Order, so that the Parties could conduct Plaintiff's deposition. *See* ECF No. 36.

WHEREAS, Defendant has been working diligently on the Motion for Summary Judgment;

WHEREAS, Defendant planned to finalize and file the Motion for Summary Judgment on March 7, 2022;

WHEREAS, beginning on or about March 2, 2022, the undersigned counsel has encountered significant technical issues with his work computer;

WHEREAS, Defendant needs additional time to finalize and file the Motion for Summary Judgment;

THEREFORE, Defendant respectfully requests that the Court extend the schedule for the Motion for Summary Judgment on Administrative Exhaustion as follows:

Event	Deadline
Deadline for Defendant's motion for summary judgment.	March 9, 2022
Deadline for Plaintiff's opposition and cross-motion for summary judgment.	March 30, 2022
Deadline for Defendant's reply and opposition to Plaintiff's cross-motion.	April 13, 2022
Deadline for Plaintiff's reply in support of her cross-motion.	April 27, 2022
Motion hearing	TBD by the Court

Respectfully submitted,

STEPHANIE M. HINDS
Acting United States Attorney

Dated: March 7, 2022

By: /s/ Christopher F. Jeu
Christopher F. Jeu
Assistant United States Attorney
Attorneys for Defendant Louis DeJoy,
U.S. Postmaster General

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

KYUNG SOOK JONES,

Plaintiff,

v.

LOUIS DEJOY, Postmaster General, United
States Postal Service (Pacific Area Agency),

Defendant.

Case No. 4:21-cv-02849-HSG

**DECLARATION OF
CHRISTOPHER F. JEU**

I, CHRISTOPHER F. JEU, declare as follows:

I am the Assistant United States Attorney assigned to the above-captioned action.

1. This declaration is made pursuant to Civil Local Rule 6-3 and in Support of the
Administrative Motion to Extend the Case Schedule regarding Administrative Exhaustion.

2. Pursuant to Local Rule 6-3(a)(1), the reason for the requested enlargement of time is
starting on or about March 2, 2022, I have encountered significant technical issues with my work
computer. I have been working diligently on the Motion for Summary Judgment. I had planned to
finalize and file the Motion for Summary Judgment by March 7, 2022. But due to technical issues,
Defendant is unable to finalize and file the Motion for Summary Judgment. Accordingly, Defendant
seeks a two-day extension to the Case Schedule.

3. Pursuant to Local Rule 6-3(a)(2), on March 7, 2022, I requested Plaintiff's views regarding a possible extension. Thus far, Plaintiff has not responded.

4. Pursuant to Local Rule 6-3(a)(3), it would be prejudicial for the Parties and the Court, if the Court did not extend the Case Schedule. It would conserve judicial and party resources to first address Administrative Exhaustion before addressing the remaining issues in Plaintiff's employment case. A short extension to the Case Schedule would not be prejudicial to the Parties or the Court.

5. Pursuant to Local Rule 6-3(a)(5), following are the time modifications in the case:

- Extension for Plaintiff’s Opposition to Defendant’s Motion to Dismiss. *See* ECF Nos. 20 and 21.
- Extension for Case Schedule on Administrative Exhaustion. *See* ECF Nos. 31 and 36.

- Extension for Case Schedule on Administrative Exhaustion. *See* ECF Nos. 31 and 36.

6. Pursuant to Local Rule 6-3(a)(6), under the requested extension, the Case Schedule for the Administrative Exhaustion issue would be extended by two (2) days.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 7, 2022 in Santa Clara County, California.

Respectfully submitted,

/s/ Christopher F. Jeu
CHRISTOPHER F. JEU


ORDER

The Court has reviewed the Administrative Motion to Extend the Case Schedule. ECF No. 39. For good cause appearing, the Court orders as follows:

Event	Deadline
Deadline for Defendant's motion for summary judgment.	March 9, 2022
Deadline for Plaintiff's opposition and cross-motion for summary judgment.	March 30, 2022
Deadline for Defendant's reply and opposition to Plaintiff's cross-motion.	April 13, 2022
Deadline for Plaintiff's reply in support of her cross-motion.	April 27, 2022
Motion hearing	May 19, 2022 at 2:00 p.m.

IT IS SO ORDERED.

Dated: 3/8/2022


HON. HAYWOOD S. GILLIAM, JR.
United States District Judge